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May 25, 2011

Ms. Marlene H. Dortch
Secretary to the
   Federal Communications
Commission
Washington, D.C. 20554

       Re: *Ex Parte* Communication- In the Matter of Framework for
       Next Generation 911 Deployment, PS Docket 10-255

Dear Ms. Dortch:

  Yesterday, on behalf of the ATX Group, Inc, Gary Wallace, Vice President for Corporate Relations, and I met with individuals of the Public Safety and Homeland Security Bureau regarding the Commission's Next Generation (NG) 911 proceeding. Patrick Donovan, David Siehl, John Healy and Henning Schulzrinne represented the Bureau.

  During the discussion we described ATX's telematics services to several automobile manufacturers and their vehicle owners. We emphasized the significant contribution automotive telematics services makes to driver and highway safety and emergency response. We discussed the value of Advanced Automatic Crash Notification (AACN) telematics provides. We noted the significant enhancements to where automotive telematics connects seamlessly to NG 911 architecture in an environment permitting unencumbered and affordable access to all public safety answering points. We responded to several questions presented by the Bureau. A copy of our response is attached.

             Respectfully,

Attachment

Copy to: Mr. Donovan, Mr. Siehl, Mr. Healy and Mr. Schulzrinne

In the Matter of Framework for Next Generation 911 Deployment

ATX provides and integrates connected vehicle, also known as telematics, technology and services to several global automobile manufacturers worldwide. ATX services are provided to vehicle owners through the brand names of its customers: Hyundai, Toyota, Lexus, BMW, PSA Peugeot Citroen (in Europe), and Rolls-Royce Motor Cars. ATX is a division of Cross Country Automotive Services (Cross Country), which manages emergency roadside assistance programs in the US on behalf of global automobile manufacturers and US insurance carriers. Services also include post-accident scene management and total loss screening services for US insurance carriers.

AXT has submitted comments to the Commissions' *Notice of Inquiry (NOI)* addressing Next Generation 911 (NG 911). By this *ex parte* document, ATX responds to several questions presented by the staff of the Public Safety and Homeland Security Bureau of the Commission.

1. How does 911 work for telematics today? How do you determine the correct PSAP? How is information, such as location, transferred?

With every telematics-generated, vehicle emergency signal, ATX receives GPS satellite generated location data link and an open, two-way voice channel into the vehicle. Response specialists screen information from vehicle occupants and assess whether there is an emergency warranting notification of emergency responders and, if so, compile details about the emergency in a structured and coherent format. This critical location and crash scene information is supplemented with customer-owner information about both the vehicle and its owners pulled from ATX servers. The aggregated information is then communicated by the ATX response specialist via interconnected Voice Over IP networks and routed, via Intrado, Inc., into native 911 trunk lines to the appropriate PSAP with jurisdiction of the vehicle's location.

ATX uses Intrado's database to align location of the vehicle with the appropriate PSAP. As a back-up, ATX maintains a proprietary database of 10-digit PSAP administrative office numbers that is updated twice a year. ATX is able to transmit to capable PSAPs location data elements and callback information. Because of the limitations of legacy PSAP networks, only GPS location coordinates and the callback number to the telematics call center is transmitted as data to the PSAP. In circumstances where the vehicle's voice channel is impaired, ATX is able to obtain and provide location information.

2. Does the mechanism generally work reliably, or are there issues (delay, wrong PSAP, admin lines not answered, etc.)?

Utilization of Intrado's PSAP database and direct routing into 9-1-1, combined with aggressive resolution efforts when challenges arise, provide a reliable system to communicate with the PSAP over voice lines. Yet, as noted, only GPS location coordinates and the callback number to the telematics call center is transmitted as data to the PSAP. The challenge is the inability to transmit information regarding the incident other than via voice.

For example, despite capability in several vehicle models to transmit critical crash data to the ATX call center so that it can be calculated to discern the likelihood of severe injury to vehicle occupants, and potential links to Web sites posting additional crash or vehicle extrication information, there is no current, uniform means among PSAPs for receiving or connecting to such data/media, to forward data that would be useful to first responders, EMS, or emergency room/trauma care upon arrival of vehicular accident victims. Working with APCO and NENA, ATX has been a party to the drafting of the Vehicle Emergency Data Set (VEDS) 3.0 document that attempts to identify all potential data points about a vehicular emergency of interest to all levels of emergency response. This inability to receive data, whether its data stemming from in-vehicle crash sensors, customer/vehicle/additional location information gleaned from ATX databases, or notes taken by ATX call takers upon initial communication with the motorist/vehicle, prevents PSAPs from advancing to the next step: transforming the data into actionable intelligence for use by those responding or accelerating their response.

3. How do you envision telematics providers and NG911 systems interacting?

The prevalence of highway and roadway incidents generating police, fire or EMS dispatch indicates how critical the NG911 framework is to improving the quality and speed of response and to highway and vehicle safety. Automotive telematics technology can provide information today that can meaningful contribute to these improvements. By interconnecting automotive telematics seamlessly and universally, NG911 framework can deliver tangible improvement at each level of emergency response thereby enhancing how public safety agencies assist the citizen needing help.

Automotive telematics interaction with NG 911 includes:

- Transmitting information regarding the incident allows response to be evaluated and shaped more effectively and timely, instead of doing so at the scene. Algorithms indicating injury severity, the number of occupants, whether seat belts are engaged, the position of the vehicle- whether it has rolled over or left the roadway and vehicular particulars that assist in extrication efforts is meaningful information that will assist response.
- Telematics centers prevent PSAPs from being further burdened by the potential for non-emergency calls, or "false alarms." ATX's 15-year experience in handling telematics-generated emergency calls has found that approximately 12% of all airbag-deployed signals either do not involve the need for notification of emergency responders (e.g. Non-injury accident requiring only a tow) or, in many instances, does not even involve an emergency (automotive service or repair technician inadvertently activates a sensor). The percentage of non-emergency calls from driver-activated requests for assistance is even more dramatic with approximately 98 percent not involving any type of emergency medical or police emergency or even a Good Samaritan call involving public safety.

After notification of the PSAP, telematics call takers remain in contact with the vehicle, continuing to monitor the situation and re-contacting the PSAP should the nature of the emergency change or new details emerge from the scene prior to responders' arrival. This frees 9-1-1 resources to respond to other emergencies.

- Telematics centers can provide additional, updated information, located off-board the vehicle, about both the vehicle and the vehicle owner. This information, tied to vehicle owner Web portals and manufacturer information about the vehicle, is continually updated and dynamic. This includes continually enhanced upgrades to the algorithms interpreting various crash data points that calculate potential likelihood of severe injury.

- Telematics centers are better equipped to upgrade continually their systems to interface with the changing electrical architectures across multiple brands of vehicles to provide a more effective resource to PSAPs.

- Telematics centers, depending on the parameters of the program contractually outlined with each automobile manufacturer, can also fill gaps in local 911 needs, such as providing certified, emergency medical dispatch instructions in areas where such localities do not provide such service.

- A NG 911 infrastructure also offers the potential to explore how real-time photos or video might be transmitted directly from a vehicle in the aftermath or during an emergency or natural calamity.

4. Would you want to be an early NG911 adopter? What would it take to make this happen?

Yes, ATX is emphatically committed to NG911. ATX's value to vehicle owners is access to effective and efficient emergency and other services. Its investment commitment relies not so much on its requirements as the universal and non proprietary character of the NG911 platform.

ATX's goal is to discern what circumstances involving a vehicle requires emergency response and to present the relevant data in a way that best serves the PSAP and other emergency responders. To be most effective in improving emergency response, automotive telematics needs access to the NG911 platform without hindrance. Open standard architecture and non-proprietary technology must also be embedded in NG911's framework.

Telematics technology must be integrated into the vehicle's electronics and crash detection safety systems. Its alignment within the vehicle's internal platform is complex. Yet, within the parameters of the cellular network, it has been able to communicate with the vehicle and transmit expanded and refined information relating to an incident. This evolution is largely attributed to the technical flexibility and openness of the network. The ability to transmit better quality information in the broadband environment also depends on an open NG911 architecture.

5. Do you have an opinion on the maturity of NG911 standards?

ATX believes that the path to more defined NG 911 standards will best be promoted by the Commission's follow up work to the *NOI* via a *Notice of Proposed Rulemaking* and its cost modeling efforts. The debate in the proceeding regarding addressing a transition and varied cost elements will be narrowed with Commission particulars. It would be detrimental to the NG 911 evolution to succumb to pleas for a general reference to standard setting bodies and to await their resolution. Rather, Commission specific inquiry or proposed courses of action, through an NPRM and ultimately an Order, provides significant incentive toward consensus.

6. Are there telematics-specific issues that need to be considered early in the NG911 roll-out?

ATX references its view that telematics must be seamlessly interconnected to the NG911 architecture to permit unencumbered and affordable access to all public safety answering points (PSAPs). There does not need to be one single path of migration to NG911 but there cannot be varieties of NG911. ATX seeks to connect to one platform – one ubiquitous interface into all PSAPs - so it can begin investing, designing and deploying its systems toward that end. Automotive telematics is the gateway through which various forms of connectivity to and from the vehicle must pass, including vital emergency voice and data communications.